

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DISTRICT

Endless River Technologies LLC,)	Case No. 1:18-cv-00936
)	
Plaintiff,)	Judge Donald C. Nugent
)	
v.)	
)	
Trans Union LLC,)	
)	
Defendant.)	

PLAINTIFF ENDLESS RIVER TECHNOLOGIES LLC'S TRIAL BRIEF

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(a) Statement of Facts

Endless River is a small Ohio limited liability company with one full-time employee. Trans Union is a global, publicly traded company, organized under Delaware law, which maintains a principal place of business in Illinois.

Richard Bonitz, Phil Wintering, and Ron Somich—all former Insurance.com executives—formed Endless River in 2009. They formed it to monetize what is now called the Quote Exchange—Mr. Bonitz’s novel idea to streamline online, comparative insurance price-quoting for consumers.

The three founders—and especially Mr. Bonitz and Mr. Wintering—had substantial experience in the auto insurance space and spent the next several years developing the concept internally and gauging market interest. Once they finalized the concept and confirmed market interest, Endless River began approaching larger companies (including Trans Union) to pursue joint development efforts to take the Quote Exchange concept to market.

After commencing discussions in early 2013, Endless River and Trans Union entered into a Development Agreement and Contract for Services (the “Agreement”) on March 31, 2014. Under the Agreement, Endless River was to provide business, technical, and product design resources while Trans Union promised to fund the Quote Exchange development and secure and maintain the IT and business resources required to bring it to market.

In the Agreement, Trans Union and Endless River agreed that Endless River would have the right to use, possess, market and monetize the Quote Exchange until and unless Trans Union exercised certain buyout rights after the product achieved a specific level of profitability. The parties further agreed that—if Trans Union terminates the Agreement or abandons or substantially

curtails the Quote Exchange—all intellectual property rights (including the source code) shall revert to ERT.

The relationship between Trans Union and Endless River was not a positive one. Testimony from Endless River principals will establish that Trans Union forced them out of the business development and technical processes—despite Endless River’s extensive experience in the insurance technology industry and deep relationships with insurance carriers—and that Trans Union botched the implementation of the Quote Exchange. Ultimately, the Quote Exchange went live in 2016, but Trans Union did not secure appropriate carriers on the platform to make it successful.

Then, on October 4, 2017, Trans Union provided 180-day notice to Endless River that it was terminating the Agreement. Later that month, Trans Union sent “stop production” notices to a number of carriers, advising them that they were shutting down the Quote Exchange and that there “will not be any further quoting activity within the platform from this point forward.”

Endless River immediately demanded—under the terms of the Agreement—that Trans Union return the Quote Exchange intellectual property, including the Quote Exchange source code, so that Endless River could continue to monetize the Quote Exchange. Rather than turning it over, Trans Union immediately revoked and prevented Endless River’s access to its work laptops, work accounts, and all work product for the Quote Exchange by disabling the laptops on which Endless River worked. It then sent Endless River a “termination agreement,” requiring payment of millions of dollars before Trans Union would turn over any intellectual property—essentially holding the code hostage.

In addition, Trans Union went to the market (including carriers and third parties that Trans Union knew Endless River had contacted post-termination-notice) and proclaimed: (1) that Trans

Union owned the Quote Exchange; (2) that it was shutting it down; and (3) that there would be no more quoting activity on the Quote Exchange. Indeed, Trans Unions specifically spoke to executives from LeadCloud and ITC to prevent them from partnering with Endless River to bring the Quote Exchange back to market. Trans Union even tried to sell the Quote Exchange source code to LeadCloud despite admittedly not owning it.

On April 24, 2018, Endless River filed this action, asserting claims for breach of contract, conversion, defamation, slander of title, misappropriation of trade secrets, violation of the Illinois Deceptive Trade Practices Act (later amended to assert a claim under the Ohio Deceptive Trade Practices Act), and tortious interference. On February 2, 2022, this Court issued its Opinion and Order on the parties' cross-motions for summary judgment, holding that the Agreement was clear and unambiguous and explicitly provided that the Quote Exchange source code reverted to Endless River's ownership.

Following this Court's ruling, six claims remain: (1) breach of contract; (2) defamation; (3) slander of title; (4) misappropriation of trade secrets under the Defend Trade Secrets Act; (5) violation of the Ohio Deceptive Trade Practices Act; and (6) tortious interference with business expectancy.

(b) Controlling Law

I. Breach of Contract

The Agreement is governed by Illinois law. To prevail on a breach of contract claim under Illinois law, Endless River must establish the following elements:

1. The existence of a valid and enforceable contract;
2. Substantial performance on the part of Endless River;
3. A breach of the contract by Trans Union; and
4. Injury to Endless River.

Avila v. CitiMortgage, Inc., 801 F.3d 777, 786 (7th Cir. 2015)

II. Trade Secret Misappropriation

To prevail on a claim for misappropriation of trade secrets under the Defend Trade Secrets Act, 18 U.S.C. § 1836 *et seq.*, Endless River must establish the following elements:

1. The existence of a protectable trade secret;
2. Misappropriation of the trade secret by Trans Union; and
3. That the trade secret is related to a product or service used in interstate commerce.

18 U.S.C. § 1836(b)(1); *see also Noco Co. v. CTEK, Inc.*, No. 1:19 CV 00853, 2020 WL 821485, at *6 (N.D. Ohio Feb. 18, 2020) (Nugent, J.)

Courts consider six factors in determining whether information constitutes a trade secret:

1. The extent to which the information is publicly known;
2. The extent to which it is known to those inside the business;
3. The precautions the holder of the trade secret takes to protect the information;
4. The value to the holder in having the information;
5. The amount of time and money expended in obtaining and developing the information; and
6. The time and expense it would take others to duplicate the information.

See Handel's Enter's, Inc. v. Schulenburg, 765 Fed Appx. 117, 122 (6th Cir. 2019); *Noco*, 2020 WL 821485, at *7. Trade secrets include “programs” or “codes.” 18 U.S.C. § 1839(3).

Misappropriation is the “disclosure or use of a trade secret of another without express or implied consent by a person who . . . at the time of disclosure or use, knew or had reason to know that the knowledge of the trade secret was . . . acquired under circumstances giving rise to a duty to maintain the secrecy of the trade secret or limit the use of the trade secret.” 18 U.S.C. § 1839(5)(B)(ii)(II).

III. Defamation

To prevail on its defamation claim, Endless River must prove four elements:

1. A false and defamatory statement concerning another;
2. An unprivileged publication to a third party;
3. Fault amounting to at least negligence on the part of Trans Union; and
4. Either actionability of the statement irrespective of special harm or the existence of special harm caused by the publication.

Kontar v. Am. Geophysical Union, No. 16-3491, 2017 WL 3402078, at *2 (6th Cir. Jan. 5, 2017).

IV. Slander of Title

To state a claim for slander of title, Endless River must prove four elements:

1. The publication of a slanderous statement disparaging Endless River's title;
2. The statement was false;
3. The statement was made with malice or made with reckless disregard for its falsity; and
4. The statement caused actual or special damages.

See Wolfe v. Bank of New York Mellon, No. 2:14-CV-00366, 2015 WL 12734085, at *8 (S.D. Ohio Mar. 16, 2015) (citing *Green v. Lemarr*, 139 Ohio App.3d 414 (2000)).

V. Tortious Interference with Business Expectancy

To prevail on a claim for tortious interference with business expectancy, Endless River must prove four elements:

1. The existence of a prospective business relationship;
2. Trans Union's knowledge thereof;
3. An intentional interference causing a breach or termination of the relationship; and
4. Damages resulting therefrom.

See First-Knox Nat'l Bank v. MSD Properties, Ltd., 47 N.E.3d 490, 494 (Ohio Ct. App. 2015).

VI. Ohio Deceptive Trade Practices Act

The Ohio Deceptive Trade Practices Act ("ODTPA"), Ohio Rev. Code Ann. § 4165.01 *et seq.*, provides that a party engages in a deceptive trade practice when the party, among other things: (1) "passes off goods or services as those of another"; (2) "causes likelihood of confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services"; or (3) "disparages the goods, services, or business of another by false representation of fact." Ohio Rev. Code Ann. § 4165.02(A)(1), (2), (10).

(c) Proposed Witness List

Endless River will call the following witnesses at trial:

1. **Richard Bonitz:** Mr. Bonitz is a founder of Endless River and serves as its president and managing partner. Endless River has also disclosed Mr. Bonitz as a non-reporting expert pursuant to Federal Rule of Civil Procedure 26(a)(2)(C). Areas of testimony include the Quote Exchange, the parties' development of the Quote Exchange, the market for the Quote Exchange, the manner in which Trans Union's mismanagement led to Quote Exchange's underperformance, Trans Union's failure to turn the Quote Exchange source code over to Endless River, Trans Union's tortious conduct, and the harm that Trans Union's conduct caused Endless River.
2. **Phil Wintering:** Mr. Wintering is a founder of Endless River. Areas of testimony include the Quote Exchange, the parties' development of the Quote Exchange, the market for the Quote Exchange, the manner in which Trans Union's mismanagement led to Quote Exchange's underperformance, Trans Union's failure to turn the Quote Exchange source code over to Endless River, Trans Union's tortious conduct, and the harm that Trans Union's conduct caused Endless River.
3. **Ronald Somich:** Mr. Somich is a founder of Endless River. Areas of testimony include the manner in which Trans Union's mismanagement led to Quote Exchange's underperformance and the financial modeling process for Quote Exchange.
4. **Dr. Andrew Malec, PhD:** Dr. Malec is a partner and managing director at O'Keefe, and also serves as the firm's chief economist. Endless River has disclosed Mr. Bonitz as an expert witness -reporting expert pursuant to Federal Rule of Civil Procedure 26(a)(2)(B). Areas of testimony include the damages that Endless River has suffered as a result of TransUnion's conduct.

Endless River may call the following witnesses:

5. **Emily Lebowitz:** Ms. Lebowitz is a Product Manager at Trans Union. Endless River may call Ms. Lebowitz as an adverse witness. Areas of testimony include Trans Union's performance under the parties' agreement, contractual and technological delays in implementing Quote Exchange, and Trans Union's statements to third party market participants following TransUnion's decision to end its involvement with Quote Exchange.
6. **Geoffrey Hakel:** Mr. Hakel is an Executive Vice President at Trans Union. Endless River may call Mr. Hakel as an adverse witness. Areas of testimony include Trans Union's decision to enter into an agreement with Endless River to develop and market Quote Exchange, Trans Union's performance under the parties' agreement, contractual and technological delays in implementing Quote Exchange, Trans Union's refusal to turn over the Quote Exchange source code and other intellectual property to Endless River, and TransUnion's statements to third party market participants following TransUnion's decision to end its involvement with Quote Exchange.

7. **David Drotos:** Mr. Drotos is a former Vice President of Product Development at Trans Union. Endless River may call Mr. Drotos as an adverse witness. Areas of testimony include Trans Union's decision to enter into an agreement with Endless River to develop and market Quote Exchange, Trans Union's performance under the parties' agreement, contractual and technological delays in implementing Quote Exchange, Trans Union's refusal to turn over the Quote Exchange source code and other intellectual property to Endless River, and TransUnion's statements to third party market participants following TransUnion's decision to end its involvement with Quote Exchange.

(d) Plaintiff's Exhibit Index

Trial Ex. No.	Bates	Description	Date
ERT_EX-0001	ERT0001154	Bonitz email -- RE: Business Plan Finances - TU2-13.xlsx	4-Feb-13
ERT_EX-0002	ERT0001157	TransUnion01-13.pptx	4-Feb-13
ERT_EX-0003	ERT0001216	Bonitz email -- Thank You - and next steps with Endless River	7-Mar-13
ERT_EX-0004	ERT0001217	Business Plan Finances - TU2-13.xlsx	7-Mar-13
ERT_EX-0005	ERT0001222	OutPerform NDA 1-22-13.pdf	8-Mar-13
ERT_EX-0006	ERT0001447	Bonitz email -- Re: Sync up	9-Jul-13
ERT_EX-0007	ERT0012851	Bonitz email -- Next Steps between TU / ERT	13-Oct-17
ERT_EX-0008	ERT0012907	Bonitz email -- Quote Exchange and next steps	8-Nov-17
ERT_EX-0009	ERT0013293	Bonitz email -- Quote Exchange - next steps	27-Sep-17
ERT_EX-0010	ERT0013356	Bonitz email -- Request for Assignment of Intellectual Property	26-Mar-18
ERT_EX-0011	ERT0013357	Request For Assignment Letter to TU.docx	26-Mar-18
ERT_EX-0012	ERT0013438	Wintering email -- BD Focus	27-Jul-17
ERT_EX-0013	ERT0013439	Copy of Active Carrier Discussion 6-17 v.2.xlsx	27-Jul-17
ERT_EX-0014	ERT0013440	Wintering email -- BD Update	2-Aug-17
ERT_EX-0015	ERT0013441	BD Sales Pipeline July 2017 v.3.xlsx	2-Aug-17
ERT_EX-0016	ERT0013668	Drotos email -- RE: Laptops and Equipment	24-Oct-17
ERT_EX-0017	ERT0000001	Rixford email -- RE: Catch up on Quote Exchange next steps	15-Jan-18
ERT_EX-0018	ERT0000024	Ocheltree email -- RE: ERT/LC chat	16-Jan-18
ERT_EX-0019	ERT0000047	Bonitz email -- Re: NonDisclosure	2-Feb-18
ERT_EX-0020	ERT0000097	Bonitz email -- Re: Accepted: Continue ERT Discussion	14-Mar-18

Trial Ex. No.	Bates	Description	Date
ERT_EX-0021	ERT0000108	Ocheltree email -- RE: Accepted: Continue ERT Discussion	15-Mar-18
ERT_EX-0022	ERT0000201	Bonitz email -- Docs for meeting	27-Sep-18
ERT_EX-0023	ERT0000202	ITC September2018.pptx	27-Sep-18
ERT_EX-0024	TU0000165	McElroy email -- RE: Meeting Today.msg	5-Jul-13
ERT_EX-0025	TU0000167	2013 06 25 Insurance Business Case V7_Clean.docx	5-Jul-13
ERT_EX-0026	TU0000189	Drotos email -- Re: QE.msg	9-Jul-13
ERT_EX-0027	TU0000304	Drotos email -- Docs for Quote Exchange, Digital Marketing Solutions.msg	12-Jul-13
ERT_EX-0028	TU0000308	Marketing VOC_Drotos_070113.docx	1-Jul-13
ERT_EX-0029	TU0000311	Quote Exchange Interview Template 071113.doc	11-Jul-13
ERT_EX-0030	TU0000313	Swinford Email -- RE: Talking Points for Quote Exchange, Digital Marketing.msg	1-Jul-13
ERT_EX-0031	TU0000653	Drotos email -- RE: QE discussion.msg	21-Aug-13
ERT_EX-0032	TU0000669	Hakel email -- Fwd: ERT Justification.msg	26-Aug-13
ERT_EX-0033	TU0000672	QE Tasks and Roles.xlsx	26-Aug-13
ERT_EX-0034	TU0000676	Adams email -- RE: ERT Justification.msg	26-Aug-13
ERT_EX-0035	TU0000678	ERT Partnership Reason_2013-08-26.pptx	26-Aug-13
ERT_EX-0036	TU0002499	Valters email -- Quote Exchange - LOI # 3 Signed.msg	27-Mar-14
ERT_EX-0037	TU0006759	Adams email -- RE: Digital Marketing Solution.msg	10-Sep-14
ERT_EX-0038	TU0006760	Current-Future Digital Marketing Products.pptx	10-Sep-14
ERT_EX-0039	TU0007240	Furlong email -- RE: Quote Exchange Bi-Monthly Leadership Meeting.msg	10-Sep-14
ERT_EX-0040	TU0007958	Coghill email -- RE: QE Targets and Core Update.msg	29-Sep-14
ERT_EX-0041	TU0009852	Wintering email -- RE: QE at PIR.msg	18-Nov-14
ERT_EX-0042	TU0010475	Ake email -- RE: Quote Exchange - Sprint 5 Stand Up Meeting - Daily Status Update.msg	4-Dec-14

Trial Ex. No.	Bates	Description	Date
ERT_EX-0043	TU0010477	Valters email -- RE: Quote Exchange - Sprint 5 Stand Up Meeting - Daily Status Update.msg	4-Dec-14
ERT_EX-0044	TU0012632	Bonitz email -- RE: Quote Exchange Valid Values - Issues between GT and Business.msg	20-Jan-15
ERT_EX-0045	TU0013279	Lebowitz email -- RE: Quote Exchange Launch Ideas.msg	4-Feb-15
ERT_EX-0046	TU0013281	Quote Exchange Product Launch Plan (DRAFT 1 27 15)_EL Comments.docx	4-Feb-15
ERT_EX-0047	TU0013542	Adams email -- RE: TU quote exchange data availability.msg	6-Feb-15
ERT_EX-0048	TU0015280	Lebowitz email -- RE: Quote Exchange Redline + Supporting Documents.msg	6-Mar-15
ERT_EX-0049	TU0015282	Liberty QE Launch Roadmap_03062015xlsx.xlsx	6-Mar-15
ERT_EX-0050	TU0019316	Hakel email -- Re: Quote exchange.msg	22-May-15
ERT_EX-0051	TU0022000	Adams email -- QE-Leadership-08-19-15_slide15.pptx.msg	19-Aug-15
ERT_EX-0052	TU0022001	QE-Leadership-08-19-15_slide15.pptx	19-Aug-15
ERT_EX-0053	TU0022288	Drotos email -- RE: CEO Review Sept 16th: Quote Exchange.msg	8-Sep-15
ERT_EX-0054	TU0022289	QE update 090815.pptx	8-Sep-15
ERT_EX-0055	TU0022762	Drotos email -- RE: QE Pipeline Touchbase.msg	30-Sep-15
ERT_EX-0056	TU0023355	Valters email -- RE: Concerns with TU delays with QE.msg	16-Oct-15
ERT_EX-0057	TU0023778	Hakel email -- RE: Concerns with TU delays with QE.msg	2-Nov-15
ERT_EX-0058	TU0023861	Lebowitz email -- Re: Concerns with TU delays with QE.msg	4-Nov-15
ERT_EX-0059	TU0026640	Drotos email -- Fwd: Quote Exchange Daily Status Update for Friday, January 15th.msg	15-Jan-16
ERT_EX-0060	TU0026653	Drotos email -- Re: Quote Exchange Daily Status Update for Friday, January 15th.msg	15-Jan-16
ERT_EX-0061	TU0026659	Lebowitz email -- QE will not launch on 1/19.msg	16-Jan-16
ERT_EX-0062	TU0031796	Lipps email -- Re: Quote Exchange Forecast v. Financial Model.msg	1-Apr-16
ERT_EX-0063	TU0035419	McElroy email -- Re: QE Resource Ask final update.msg	24-May-16
ERT_EX-0064	TU0036455	Lebowitz email -- TransUnion Quote Exchange - Information.msg	3-Jun-16

Trial Ex. No.	Bates	Description	Date
ERT_EX-0065	TU0036456	INS-15-4059 Quote Exchange Asset Sheet (4 11 16) (002).pdf	3-Jun-16
ERT_EX-0066	TU0036458	05.16.16 - Quote Exchange Press Release.pdf	3-Jun-16
ERT_EX-0067	TU0045376	Lebowitz email -- FW: Updated Financial Model - Quote Exchange.msg	8-Aug-16
ERT_EX-0068	TU0045378	FinModel3.9.xlsx	8-Aug-16
ERT_EX-0069	TU0045787	Lebowitz email -- Why is the QE underperforming in 2016?.msg	24-Aug-16
ERT_EX-0070	TU0046163	Moran email -- TAI-TU Visit October 4 – 6.msg	7-Sep-16
ERT_EX-0071	TU0046167	TransUnion's Quote Exchange AIR.docx	7-Sep-16
ERT_EX-0072	TU0047526	Drotos email -- RE: TU Quote Exchange for Life .msg	5-Oct-16
ERT_EX-0073	TU0047527	INS_QuoteExch_RGA_100516.pptx	5-Oct-16
ERT_EX-0074	TU0047543	ATT33784	5-Oct-16
ERT_EX-0075	TU0047972	Drotos email -- RE: QE follow-ups.msg	31-Oct-16
ERT_EX-0076	TU0048030	Cohen email -- Re: QE Code Refactoring.msg	2-Nov-16
ERT_EX-0077	TU0048041	Lebowitz email -- RE: Key Risks.msg	3-Nov-16
ERT_EX-0078	TU0048935	Adams email -- RE: QE December Core Team Meeting.msg	15-Dec-16
ERT_EX-0079	TU0048936	QEXCoreTeamMonthly_2016-12.pptx	15-Dec-16
ERT_EX-0080	TU0049394	Drotos email -- GT Capacity Planning for QE .msg	3-Feb-17
ERT_EX-0081	TU0049543	Coghill email -- Quote Exchange.msg	13-Feb-17
ERT_EX-0082	TU0049551	Coghill email -- Quote Exchange 2017 Revenue.msg	13-Feb-17
ERT_EX-0083	TU0049749	Drotos email -- FW: Quote Exchange.msg	23-Feb-17
ERT_EX-0084	TU0053661	Adams email -- Pivot Ideas.msg	1-Sep-17
ERT_EX-0085	TU0053662	QE Pivot Ideas.docx	1-Sep-17
ERT_EX-0086	TU0053715	Drotos email -- RE: Pivot Ideas.msg	5-Sep-17

Trial Ex. No.	Bates	Description	Date
ERT_EX-0087	TU0053716	QE Pivot Ideas_EL_DD 090517.docx	5-Sep-17
ERT_EX-0088	TU0053914	Adams email -- Pivot Ideas .msg	8-Sep-17
ERT_EX-0089	TU0053915	QE-Pivot Ideas-09-2017.xlsx	8-Sep-17
ERT_EX-0090	TU0053916	QE Pivot Ideas_EL_DD 090517.docx	8-Sep-17
ERT_EX-0091	TU0054057	Adams email -- RE: Pivot Ideas .msg	13-Sep-17
ERT_EX-0092	TU0054059	QE-Pivot Ideas-09-2017.xlsx	13-Sep-17
ERT_EX-0093	TU0054182	Adams email -- Quote Exchange Pivot Ideas.msg	18-Sep-17
ERT_EX-0094	TU0054183	QE Pivot Ideas-091817.docx	18-Sep-17
ERT_EX-0095	TU0054615	Drotos email -- FW: Quote Exchange - one pagers.msg	25-Oct-17
ERT_EX-0096	TU0054616	Quote Exchange_Backpocket slide.pptx	25-Oct-17
ERT_EX-0097	TU0054618	INS-15-4059 Quote Exchange Asset Sheet (4 11 16) (002).pdf	25-Oct-17
ERT_EX-0098	TU0054620	Drotos email -- RE: Quote Exchange (Bi-Weekly).msg	27-Oct-17
ERT_EX-0099	TU0054633	Drotos email -- RE: Plan B options.msg	8-Nov-17
ERT_EX-0100	TU0054634	QE Pivot Ideas-091817.docx	8-Nov-17
ERT_EX-0101	TU0054699	Drotos email -- Re: Quote Exchange Discussion .msg	17-Apr-18
ERT_EX-0102	TU0057219	Reynolds email -- FW: Quote_Exchange Draft - Clean 6-10.docx.msg	30-Jun-13
ERT_EX-0103	TU0063073	Drotos email -- Quote Exchange.msg	5-Aug-13
ERT_EX-0104	TU0064973	Lipps email -- RE: Marketing VOC's.msg	16-Aug-13
ERT_EX-0105	TU0069048	Bonitz email -- Re: projections.msg	4-Oct-13
ERT_EX-0106	TU0069409	McElroy email -- RE: QE.msg	14-Oct-13
ERT_EX-0107	TU0070731	NDA for Phil.pdf	29-Oct-13
ERT_EX-0108	TU0073976	Drotos email -- RE: Agreement.msg	9-Dec-13

Trial Ex. No.	Bates	Description	Date
ERT_EX-0109	TU0078020	Safe Auto MNDA 01092014.pdf	27-Jan-14
ERT_EX-0110	TU0103446	Permanent General-NDA.PDF	6-Aug-14
ERT_EX-0111	TU0115729	AmFam NDA 10.8.12.pdf	29-Sep-14
ERT_EX-0112	TU0122647	TU NDA2.pdf	13-Nov-14
ERT_EX-0113	TU0126423	TRAVELERS NDA AMENDMENT #1 - 10012013 TERM EXT - MUTUAL NON-DISCLOSURE A....pdf	15-Dec-14
ERT_EX-0114	TU0133892	Sentry signed TransUnionNDA addendum.pdf	5-Feb-15
ERT_EX-0115	TU0143439	American Independent Quote Exchange Addendum 31315.pdf	13-Mar-15
ERT_EX-0116	TU0143577	Drotos email -- RE: QE Revenue Walk Slide.msg	13-Mar-15
ERT_EX-0117	TU0143854	Moran email -- RGAX - Deeper Strategic Alliance Relationship.msg	16-Mar-15
ERT_EX-0118	TU0143859	RGA Org Charts 3.16.15.pdf	16-Mar-15
ERT_EX-0119	TU0152373	Moran email -- RGAX - Deeper Strategic Alliance Relationship - May 5th Final Agenda.msg	29-Apr-15
ERT_EX-0120	TU0162721	VikingSentry Insurance_QE Addendum.pdf	5-Jun-15
ERT_EX-0121	TU0170251	ITC_NDA with 3rd Party Rights 70915.pdf	17-Jul-15
ERT_EX-0122	TU0176559	Insurance Portal Services LLC DBA Fetch_MNDA 2015.pdf	25-Aug-15
ERT_EX-0123	TU0181270	PERMANENT GENERAL_QE Addendum with 3rd Party Platform Amendment_Fully Executed_09252015.pdf	25-Sep-15
ERT_EX-0124	TU0183629	Travelers NDA 9-19-12.pdf	19-Oct-15
ERT_EX-0125	TU0184555	Direct General Insurance Agency_QE Addendum.pdf	29-Oct-15
ERT_EX-0126	TU0184571	Direct General_Contract.pdf	29-Oct-15
ERT_EX-0127	TU0193854	Adams email -- RE: Quote Exchange Billing & Accounting - Final Prep Meeting.msg	13-Jan-16
ERT_EX-0128	TU0193858	Liberty Mutual_TU Quote Exchange_06-10-15_EXECUTED.pdf	13-Jan-16
ERT_EX-0129	TU0193878	VikingSentry Insurance_QE Addendum_EXECUTED.pdf	13-Jan-16

Trial Ex. No.	Bates	Description	Date
ERT_EX-0130	TU0193891	Direct General Insurance Agency_QE Addendum.pdf	13-Jan-16
ERT_EX-0131	TU0193907	DHI-QE SOW 2015.pdf	13-Jan-16
ERT_EX-0132	TU0199543	Jupiter Managing General Agency Inc_QE Addendum_Executed.pdf	12-Feb-16
ERT_EX-0133	TU0200066	Lebowitz email -- State Rollout Plan as of 01252016.xlsx.msg	16-Feb-16
ERT_EX-0134	TU0200067	State Rollout Plan as of 01252016.xlsx	16-Feb-16
ERT_EX-0135	TU0203868	TransUnion Quote Exchange NDA 3-2016.pdf	4-Mar-16
ERT_EX-0136	TU0210893	McElroy email -- Updated Life Business Plan (MORE PROCESS).msg	4-Apr-16
ERT_EX-0137	TU0216491	Lebowitz email -- FW: Financial Model Scenario.msg	5-May-16
ERT_EX-0138	TU0216492	FinModel3.85lowres.xlsx	5-May-16
ERT_EX-0139	TU0219824	LIBERTY MUTUAL_Amendment to QE Addendum-executed_05-26-16.pdf	26-May-16
ERT_EX-0140	TU0222099	Transunion Quote Exchange Agreement_20160610.pdf	10-Jun-16
ERT_EX-0141	TU0240670	Drotos email -- RE: Quote Exchange Meeting on Oct 5 - Confirmed (SRO).msg	21-Sep-16
ERT_EX-0142	TU0249456	TransUnion - Quote Exchange Addendum to MSA 051316 CLEAN - Mercury FINAL Signe .pdf	14-Nov-16
ERT_EX-0143	TU0254335	McElroy email -- Re: QEX: Permanent General is Live in TX & TN!.msg	16-Jan-17
ERT_EX-0144	TU0256894	Transunion Agreement 2.10.17.pdf	10-Feb-17
ERT_EX-0145	TU0260065	Safe Auto_Quote Exchange Addendum-signed.pdf	24-Feb-17
ERT_EX-0146	TU0263411	MGA (Gainsco)_Quote Exchange Addendum-signed.pdf	4-Apr-17
ERT_EX-0147	TU0270311	Adams email -- RE: ERT.msg	30-May-17
ERT_EX-0148	TU0274464	Windhaven QE Addendum 6-28-17.pdf	28-Jun-17
ERT_EX-0149	TU0276646	Sundaram email -- RE: QEX Platform Technical Errors.msg	19-Jul-17
ERT_EX-0150	TU0281387	Hallmark QE Services Addendum signed.pdf	31-Aug-17

Trial Ex. No.	Bates	Description	Date
ERT_EX-0151	TU0283307	Burns email -- FW: Amica - Life.msg	14-Sep-17
ERT_EX-0152	TU0284430	Drotos email -- QE Next Steps.msg	25-Sep-17
ERT_EX-0153	TU0284431	QE Exit 092117.docx	25-Sep-17
ERT_EX-0154	TU0284435	Lebowitz email -- FW: Liberty Mutual - QE.msg	25-Sep-17
ERT_EX-0155	TU0284873	Hakel email -- FW: Notice of Termination.msg	6-Oct-17
ERT_EX-0156	TU0285010	Hart email -- RE: Hello again.msg	9-Oct-17
ERT_EX-0157	TU0285245	Adams email -- RE: Growth & Operating Initiatives (CEO Staff Mtg) Slides [DUE: 10/16/17].msg	13-Oct-17
ERT_EX-0158	TU0285603	Kimble email -- Re: TransUnion Quote Exchange - Update.msg	23-Oct-17
ERT_EX-0159	TU0286427	Drotos email -- RE: Plan B options.msg	8-Nov-17
ERT_EX-0160	TU0286429	QE Options Oct 17 LOB.pptx	8-Nov-17
ERT_EX-0161	TU0286430	Hakel email -- QE Plan B Options for LOB deck .msg	8-Nov-17
ERT_EX-0162	TU0286431	QE Options Oct 17 LOB (002).pptx	8-Nov-17
ERT_EX-0163	TU0288422	Drotos email -- RE: The LeadCloud Marketplace & Directory.msg	2-Feb-18
ERT_EX-0164	TU0288959	Hakel email -- RE: ERT / Leadcloud.msg	9-Mar-18
ERT_EX-0165	TU0289058	Moran email -- Amica Activity.msg	5-Apr-18
ERT_EX-0166	TU0289094	Drotos email -- Life GTM Review continued.msg	9-Apr-18
ERT_EX-0167	TU0289095	TRL GTM (1.17.18) v5.pptx	9-Apr-18
ERT_EX-0168	TU0290003	Moran email -- RE: CEO Review Sept 16th: Quote Exchange - Update Needed NOON 09/08.msg	4-Sep-15
ERT_EX-0169	ITC000001	ITC_NDA with 3rd Party Rights 70915.pdf	9-Jul-15
ERT_EX-0170	ITC000020	Rixford email -- 20180115112334,Laird Rixford LRixford@getitc.com,Richard Bonitz rbonitz@gmail.com, Phil Wintering phil@outperformassociates.com_12.eml	15-Jan-18

Trial Ex. No.	Bates	Description	Date
ERT_EX-0171	TU0295747	LeadCloud NDA 12.1.14.pdf	4-Dec-14
ERT_EX-0172	TU0295759	Liberty Mutual_Quote Exchange Development MNDA Addendum 11-6-14.pdf	9-Dec-14
ERT_EX-0173	TU0297908	Quote Exchange Addendum_Sun Coast_Signed .pdf	14-Aug-17
ERT_EX-0174	TU0303514	Infinity MNDA_Executed 060614.doc.pdf	9-Jun-14
ERT_EX-0175	TU0305937	TU QE and Direct General Contract.pdf	23-Oct-15
ERT_EX-0176	TU0306053	TU-Travelers Mutual NDA - CW2324879 - Final - 1-5-16.pdf	6-Jan-16
ERT_EX-0177	TU0328537	Moran email -- FW: RGAX - Deeper Strategic Alliance Relationship.msg	22-Mar-15
ERT_EX-0178	TU0332937	Microsoft Word Document	11-Aug-15
ERT_EX-0179	N/A	Kirkland & Ellis Letter	14-Jul-22
ERT_EX-0180	N/A	Kirkland & Ellis Letter	19-Jul-22
ERT_EX-0181	N/A	The Quote Exchange source code	-
ERT_EX-0182	ERT0001135	Wintering email - FW: Recap	17-Jan-13
ERT_EX-0183	ERT0001137	Mutual NDA Nov 2012.docx	17-Jan-13
ERT_EX-0184	ERT0013212	Bonitz email - FW: Notice of Termination	4-Oct-17
ERT_EX-0185	ERT0013213	ERT Development Agreement and Contract for Services Termination Letter 10-04-17 (2) CLEAN.docx	4-Oct-17
ERT_EX-0186	TU0001276	Drotos email - RE: Invitation: TransUnion's Quote Exchange and Consumer Digital Marketing Solutions (Oct 28 09:00 AM PDT in Farmers Insurance).msg	27-Oct-13
ERT_EX-0187	TU0001278	Farmers_Quote Exchange VOC_2013-10-27.pdf	27-Oct-13
ERT_EX-0188	TU0001287	Quote Exchange Model Calculator_093013.xlsx	27-Oct-13
ERT_EX-0189	TU0017274	Brooks email - Quote Exchange - BD / Sales Updates.msg	13-Apr-15
ERT_EX-0190	TU0017275	Quote Exchange Weekly BD Update_4_13_2015.xls	13-Apr-15

Trial Ex. No.	Bates	Description	Date
ERT_EX-0191	TU0022601	Lebowitz email - QE Update for DHI_09222015.pptx.msg	21-Sep-15
ERT_EX-0192	TU0022602	QE Update for DHI_09222015.pptx	21-Sep-15
ERT_EX-0193	TU0036401	QE_CEOUpdate_053116PM_EL edits.pptx	31-May-16
ERT_EX-0194	TU0054252	Lebowitz email - QE BD Tracking as of 9/7/17.msg	19-Sep-17
ERT_EX-0195	TU0054253	BD Sales Pipeline_09072017v2.xlsx	19-Sep-17
ERT_EX-0196	TU0055179	Hakel email - FW: Endless River (RE: meeting tomorrow ...).msg	12-Feb-13
ERT_EX-0197	TU0055182	TransUnion2-13v2.pptx	12-Feb-13
ERT_EX-0198	TU0055202	NOFILENAME007.xlsx	12-Feb-13
ERT_EX-0199	TU0055203	Ask.docx	12-Feb-13
ERT_EX-0200	TU0218945	Lebowitz email - ERT agreements.msg	23-May-16
ERT_EX-0201	TU0218946	ERT Development Agreement EXECUTED 3.31.14.pdf	23-May-16
ERT_EX-0202	TU0218954	ERT_Amendment No 2 to Devleopment Agreement 8.25.14 EXECUTED.pdf	23-May-16
ERT_EX-0203	TU0274472	Lebowitz email - RE: Insurance Zebra Meeting.msg	28-Jun-17
ERT_EX-0204	TU0274476	The_Zebra - MNDA signed.pdf	28-Jun-17
ERT_EX-0205	TU0275942	Lebowitz email - BD Status Update - NEW FORMAT.msg	12-Jul-17
ERT_EX-0206	TU0275943	BD Sales Pipeline_July 2017.xlsx	12-Jul-17
ERT_EX-0207	TU0276609	Wintering email - RE: BD Status Update - NEW FORMAT.msg	17-Jul-17
ERT_EX-0208	TU0276611	BD Sales Pipeline_July 2017 v.2.xlsx	17-Jul-17
ERT_EX-0209	TU0278761	Lebowitz email - FW: BD Update.msg	3-Aug-17
ERT_EX-0210	TU0278762	BD Sales Pipeline_July 2017 v.3.xlsx	3-Aug-17
ERT_EX-0211	TU0281871	Wintering email - RE: Biz Dev Slide for LOB.msg	6-Sep-17
ERT_EX-0212	TU0281873	BD Sales Pipeline_Sept 2017 v.3.xlsx	6-Sep-17

Trial Ex. No.	Bates	Description	Date
ERT_EX-0213	TU0088877	Drotos email - FW: FW: Letter of Intent - PRNJ [ref: 00D301KbX_500a0ht3bJ:ref].msg	25-Apr-14
ERT_EX-0214	TU0088879	Plymouth Rock-LOI Quote Exchange 4.25.14.pdf	25-Apr-14
ERT_EX-0215	TU0088713	FW: LOI.msg	23-Apr-14
ERT_EX-0216	TU0088714	LOI.pdf	23-Apr-14
ERT_EX-0217	TU0075091	Quote Exchange - Fully executed Letter of Intent.msg	23-Dec-2013
ERT_EX-0218	TU0075092	Liberty LOI 12.20.13.PDF	23-Dec-2013
ERT_EX-0219	TU0072677	FW: Quote Exchange Documents.msg	21-Nov-2013
ERT_EX-0220	TU0072684	TU LOI 11-21-13.pdf	21-Nov-2013
ERT_EX-0221	TU0285596	Lebowitz email - TransUnion Quote Exchange-Update.msg	23-Oct-17
ERT_EX-0222	ERT0000002	Ocheltree email - RE: Quote Exchange next steps	15-Jan-18
ERT_EX-0223	N/A	Trans Union, LLC's Objections and Answers to Endless River Technologies, LLC's First Set of Interrogatories	3-Apr-19
ERT_EX-0224	N/A	Trans Union, LLC's Supplemental Objections and Answers to Endless River Technologies, LLC's First Set of Interrogatories	17-Jan-20
ERT_EX-0225	TU0285581	Lebowitz email - Final notice to QE quoting carriers.msg	23-Oct-17
ERT_EX-0226	TU0285582	Final email to quoting carriers.docx	23-Oct-17
ERT_EX-0227	TU0285583	Drotos email RE: Final notice to QE quoting carriers.msg	23-Oct-17
ERT_EX-0228	TU0285589	Lebowitz email - TransUnion Quote Exchange - update.msg	23-Oct-17
ERT_EX-0229	TU0285590	Lebowitz email - TransUnion Quote Exchange - update.msg	23-Oct-17
ERT_EX-0230	TU0285591	Lebowitz email - Quote Exchange - Update.msg	23-Oct-17
ERT_EX-0231	TU0285592	Lebowitz email - TransUnion Quote Exchange - Update .msg	23-Oct-17
ERT_EX-0232	TU0285593	Lebowitz email - TransUnion Quote Exchange Update .msg	23-Oct-17
ERT_EX-0233	TU0285594	Lebowitz email - TransUnion Quote Exchange - update.msg	23-Oct-17

Trial Ex. No.	Bates	Description	Date
ERT_EX- 0234	TU0285650	Adams email - FW: TransUnion Quote Exchange - Update.msg	24-Oct-17

(e) Evidentiary Issues Likely to Arise at Trial

Endless River has described the evidentiary issues likely to arise at trial in its motions in limine (ECF Nos. 221 – 229) and its objections to Trans Union’s list of proposed trial exhibits, as set forth below:

TU Trial Ex. No.	Bates	Objection
TU_EX-0001	ERT0000591	FRE 401 – Relevance
TU_EX-0001	ERT0000592	FRE 401 – Relevance
TU_EX-0002	ERT0000630	FRE 401 - Relevance; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0002	ERT0000631	FRE 401 - Relevance; FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0003	ERT0000634	FRE 403 - Prejudice; FRE 401 – Relevance
TU_EX-0003	ERT0000636	FRE 403 - Prejudice; FRE 401 – Relevance
TU_EX-0004	ERT0000706	
TU_EX-0004	ERT0000707	
TU_EX-0005	TU0055156	
TU_EX-0006	TU0055092	
TU_EX-0006	TU0055093	
TU_EX-0007	ERT0001144	
TU_EX-0008	TU0055150	
TU_EX-0008	TU0055152	
TU_EX-0009	TU0055153	
TU_EX-0009	TU0055156	
TU_EX-0010	ERT0001152	
TU_EX-0011	ERT0001183	
TU_EX-0012		
TU_EX-0013	TU0055204	
TU_EX-0013	TU0055205	
TU_EX-0014	TU0055391	
TU_EX-0014	TU0055392	
TU_EX-0015	TU0056362	FRE 802 – Hearsay
TU_EX-0015	TU0056364	FRE 802 – Hearsay
TU_EX-0015	TU0056384	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0016	TU0059777	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0016	TU0059798	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0017	TU0064587	FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0017	TU0064589	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0017	TU0064607	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0018	TU0065317	FRE 403 - Prejudice; FRE 401 – Relevance
TU_EX-0018	TU0065318	FRE 403 - Prejudice; FRE 401 – Relevance
TU_EX-0019	TU0069048	
TU_EX-0020	TU0071860	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0020	TU0071861	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0021	TU0001858	FRE 802 – Hearsay
TU_EX-0021	TU0001859	FRE 802 – Hearsay
TU_EX-0022	ERT0000323	
TU_EX-0022	ERT0000326	
TU_EX-0022	ERT0000374	
TU_EX-0022	ERT0000389	
TU_EX-0023	TU0002536	FRE 802 – Hearsay
TU_EX-0023	TU0002537	FRE 802 – Hearsay
TU_EX-0024	TU0083771	FRE 802 – Hearsay
TU_EX-0025	TU0083775	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 802 – Hearsay
TU_EX-0026	TU0086343	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0026	TU0086345	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0027	TU0086777	FRE 802 – Hearsay
TU_EX-0027	TU0086779	
TU_EX-0028	TU0002977	
TU_EX-0028	TU0002978	FRE 802 – Hearsay
TU_EX-0029	TU0088952	
TU_EX-0030	TU0088981	
TU_EX-0031	TU0089398	
TU_EX-0031	TU0089400	
TU_EX-0032	TU0093972	FRE 802 – Hearsay
TU_EX-0033	TU0095321	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0033	TU0095322	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0033	TU0095343	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0033	TU0095345	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0033	TU0095348	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0033	TU0095351	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0033	TU0095354	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0033	TU0095357	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0034	TU0095762	FRE 802 – Hearsay
TU_EX-0035	TU0004457	FRE 802 – Hearsay
TU_EX-0035	TU0004458	FRE 602 - Foundation; FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0035	TU0004459	FRE 802 - Hearsay;
TU_EX-0035	TU0004461	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0035	TU0004462	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0036	TU0097162	FRE 802 – Hearsay
TU_EX-0036	TU0097163	
TU_EX-0037	TU0004927	FRE 802 – Hearsay
TU_EX-0038	TU0004962	FRE 802 – Hearsay
TU_EX-0039	TU0102132	FRE 802 – Hearsay
TU_EX-0039	TU0102133	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0040	TU0006275	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0040	TU0006276	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0041	TU0006656	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0041	TU0006657	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0042	TU0006750	FRE 802 – Hearsay
TU_EX-0043	TU0006759	FRE 802 – Hearsay
TU_EX-0043	TU0006760	FRE 802 – Hearsay
TU_EX-0044		Document not found
TU_EX-0045	ERT0001666	
TU_EX-0046	TU0123424	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0046	TU0123425	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0046	TU0123427	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0046	TU0123429	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0047	ERT0001754	FRE 401 - Relevance
TU_EX-0048	TU0126558	
TU_EX-0048	TU0126559	
TU_EX-0049	ERT0001824	
TU_EX-0049	ERT0001828	FRE 802 – Hearsay
TU_EX-0050	TU0127925	FRE 802 – Hearsay
TU_EX-0050	TU0127928	FRE 802 – Hearsay
TU_EX-0051	ERT0001805	
TU_EX-0052	TU0129742	FRE 802 – Hearsay
TU_EX-0053	TU0130755	
TU_EX-0053	TU0130757	
TU_EX-0054	TU0012632	FRE 802 – Hearsay
TU_EX-0055		FRE 802 – Hearsay
TU_EX-0056	TU0131221	FRE 802 – Hearsay
TU_EX-0057	TU0013073	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0057	TU0013074	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0058	TU0135069	FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0058	TU0135070	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0059	TU0014542	FRE 802 – Hearsay
TU_EX-0060	TU0014640	FRE 802 – Hearsay
TU_EX-0060	TU0014641	FRE 802 – Hearsay
TU_EX-0061	TU0015410	
TU_EX-0061	TU0015413	
TU_EX-0061	TU0015415	
TU_EX-0062		FRE 802 – Hearsay
TU_EX-0063	ERT0001897	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0064	TU0146295	FRE 802 – Hearsay
TU_EX-0064	TU0146296	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0065	ERT0001973	
TU_EX-0065	ERT0001974	
TU_EX-0066	ERT0002095	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0067	ERT0002097	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0068	ERT0002111	
TU_EX-0069	TU0019495	FRE 802 – Hearsay
TU_EX-0070	TU0019517	FRE 802 – Hearsay
TU_EX-0071	TU0019585	
TU_EX-0071	TU0019588	
TU_EX-0072	TU0019533	
TU_EX-0073	TU0019599	FRE 401 - Relevance; Motion in Limine; FRE 802 - Hearsay
TU_EX-0074	ERT0002163	
TU_EX-0075	ERT0002182	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0076	TU0020140	FRE 802 - Hearsay;
TU_EX-0076	TU0020141	FRE 602 - Foundation; FRE 802 - Hearsay;
TU_EX-0077	ERT0002344	
TU_EX-0077	ERT0002345	
TU_EX-0078	ERT0002349	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 802 – Hearsay
TU_EX-0079	TU0173589	FRE 802 – Hearsay
TU_EX-0080	TU0177592	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0081	ERT0002452	FRE 401 - Relevance
TU_EX-0082	TU0177841	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0083	TU0022626	FRE 802 – Hearsay
TU_EX-0083	TU0022627	FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0084	TU0022727	FRE 802 – Hearsay
TU_EX-0084	TU0022729	FRE 802 – Hearsay
TU_EX-0084	TU0022731	FRE 802 – Hearsay
TU_EX-0085	TU0022729	FRE 802 – Hearsay
TU_EX-0086	TU0022770	FRE 802 - Hearsay
TU_EX-0086	TU0022772	FRE 802 - Hearsay
TU_EX-0086	TU0022778	FRE 802 – Hearsay
TU_EX-0087	TU0022788	FRE 802 – Hearsay
TU_EX-0087	TU0022789	FRE 802 – Hearsay
TU_EX-0088	TU0022872	FRE 802 – Hearsay
TU_EX-0089	TU0022874	FRE 802 – Hearsay
TU_EX-0090	TU0023896	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0091	TU0188341	
TU_EX-0091	TU0188342	
TU_EX-0091	TU0188343	
TU_EX-0092	TU0189265	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0092	TU0189266	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0093		FRE 802 – Hearsay
TU_EX-0094	TU0196297	FRE 802 – Hearsay
TU_EX-0094	TU0196298	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0095	TU0311481	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0096	TU0027850	FRE 802 – Hearsay
TU_EX-0096	TU0027851	FRE 802 – Hearsay
TU_EX-0097	TU0200510	FRE 802 – Hearsay
TU_EX-0097	TU0200511	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0098	TU0202355	FRE 802 – Hearsay
TU_EX-0098	TU0202356	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0099	TU0204840	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0100	TU0033225	FRE 802 - Hearsay
TU_EX-0100	TU0033226	FRE 802 - Hearsay
TU_EX-0101	TU0216150	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0102	TU0217072	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0103		FRE 401 - Relevance; FRE 403 - Prejudice
TU_EX-0104		FRE 401 - Relevance; FRE 403 - Prejudice
TU_EX-0105		FRE 401 - Relevance; FRE 403 - Prejudice
TU_EX-0106	ERT0003464	
TU_EX-0107	TU0218945	FRE 802 – Hearsay
TU_EX-0107	TU0218946	

TU Trial Ex. No.	Bates	Objection
TU_EX-0107	TU0218954	
TU_EX-0108	TU0036625	FRE 802 – Hearsay
TU_EX-0108	TU0036626	FRE 802 – Hearsay
TU_EX-0108	TU0036630	FRE 802 – Hearsay
TU_EX-0109	TU0221360	FRE 802 – Hearsay
TU_EX-0110	TU0227894	
TU_EX-0110	TU0227895	
TU_EX-0111	TU0231345	FRE 802 - Hearsay
TU_EX-0112	TU0045379	FRE 802 - Hearsay
TU_EX-0113	TU0234840	FRE 802 – Hearsay
TU_EX-0114	TU0235807	FRE 802 – Hearsay
TU_EX-0114	TU0235809	
TU_EX-0115	TU0237715	
TU_EX-0116	ERT0004343	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0117	TU0240487	FRE 802 – Hearsay
TU_EX-0118	TU0241670	
TU_EX-0118	TU0241671	
TU_EX-0119		FRE 401 - Relevance; FRE 403 - Prejudice
TU_EX-0120	ERT0014106	
TU_EX-0121	ERT0006919	
TU_EX-0122	TU0254331	FRE 802 – Hearsay
TU_EX-0123	TU0259556	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0123	TU0259558	
TU_EX-0124	ERT0008127	
TU_EX-0125	ERT0008534	FRE 802 – Hearsay
TU_EX-0126	TU0261552	FRE 802 – Hearsay
TU_EX-0127	TU0261560	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0128	TU0261564	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0129	TU0261964	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0129	TU0261965	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0130	ERT0008625	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0131	ERT0008850	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0132	TU0263164	FRE 802 - Hearsay
TU_EX-0132	TU0263165	FRE 802 - Hearsay
TU_EX-0132	TU0263166	FRE 802 - Hearsay
TU_EX-0133	TU0263392	FRE 802 – Hearsay
TU_EX-0134	TU0263401	FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0135	TU0263578	FRE 802 – Hearsay
TU_EX-0136	TU0263613	FRE 802 - Hearsay
TU_EX-0137	TU0264632	FRE 802 – Hearsay
TU_EX-0138	ERT0009511	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0138	ERT0009513	
TU_EX-0139	TU0265450	FRE 802 – Hearsay
TU_EX-0140	ERT0009849	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0141	ERT0009907	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 802 – Hearsay
TU_EX-0142	ERT0009914	FRE 802 – Hearsay
TU_EX-0143	ERT0009940	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 802 – Hearsay
TU_EX-0144	TU0269069	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0144	TU0269071	
TU_EX-0144	TU0269086	
TU_EX-0145		FRE 401 - Relevance; FRE 403 - Prejudice; Motion in Limine
TU_EX-0146	ERT0010836	
TU_EX-0146	ERT0010837	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 802 – Hearsay
TU_EX-0147	ERT0010841	FRE 403 - Prejudice; FRE 401 - Relevance
TU_EX-0148	ERT0010845	FRE 403 - Prejudice; FRE 401 - Relevance
TU_EX-0149	TU0273494	FRE 401 - Relevance; FRE 408 - Settlement Communications
TU_EX-0150	ERT0011594	
TU_EX-0150	ERT0011595	
TU_EX-0151	ERT0011813	
TU_EX-0151	ERT0011814	FRE 802 - Hearsay
TU_EX-0152	TU0277632	FRE 802 – Hearsay
TU_EX-0152	TU0277634	FRE 802 - Hearsay
TU_EX-0153	TU0277982	
TU_EX-0153	TU0277983	
TU_EX-0154	TU0315055	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0155	TU0279950	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0155	TU0279954	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0155	TU0279970	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0156	TU0280466	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0156	TU0280470	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0157	TU0281888	FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0157	TU0281890	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0157	TU0281892	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0158	TU0281651	FRE 802 - Hearsay;
TU_EX-0159	TU0282818	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0159	TU0282822	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0160	TU0282833	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0161	TU0284002	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0161	TU0284007	FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0162	TU0284434	FRE 802 – Hearsay
TU_EX-0163	ERT0013293	
TU_EX-0164	ERT0012714	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0165	ERT0012726	FRE 802 – Hearsay
TU_EX-0166	ERT0012747	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0166	ERT0012748	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012749	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012750	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012751	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012752	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012753	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012754	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012755	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012756	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0166	ERT0012757	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012758	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012759	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012760	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0166	ERT0012761	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012762	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0167	ERT0012763	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012776	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012777	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012778	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012784	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012785	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012786	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012787	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0167	ERT0012789	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0167	ERT0012790	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0168		
TU_EX-0169	ERT0012792	
TU_EX-0169	ERT0012793	
TU_EX-0170	ERT0012795	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0170	ERT0012796	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012799	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012800	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012801	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012802	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012803	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012804	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012811	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012821	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0170	ERT0012841	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 – Hearsay
TU_EX-0171	TU0285161	FRE 802 – Hearsay
TU_EX-0171	TU0285163	
TU_EX-0172	ERT0012848	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0173	ERT0013344	FRE 802 – Hearsay

TU Trial Ex. No.	Bates	Objection
TU_EX-0174	ERT0012851	
TU_EX-0175	TU0054578	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 802 – Hearsay
TU_EX-0176	TU0285583	FRE 802 – Hearsay
TU_EX-0177	TU0285596	
TU_EX-0178	TU0285650	
TU_EX-0179	TU0054601	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 802 – Hearsay
TU_EX-0180	ERT0012886	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0180	ERT0012887	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; FRE 602 - Foundation; FRE 802 - Hearsay; Motion in Limine
TU_EX-0181	ERT0013378	
TU_EX-0182	ERT0000742	FRE 403 - Prejudice; FRE 401 – Relevance
TU_EX-0182	ERT0000743	FRE 403 - Prejudice; FRE 401 – Relevance
TU_EX-0183	ERT0012953	
TU_EX-0184	ITC000019	
TU_EX-0185		
TU_EX-0186	TU0287973	
TU_EX-0187	ERT0000034	
TU_EX-0188	ERT0013261	FRE 408 - Settlement Communications
TU_EX-0188	ERT0013262	FRE 408 - Settlement Communications
TU_EX-0189	ERT0013050	FRE 502 – Privilege
TU_EX-0189	ERT0013051	FRE 502 – Privilege
TU_EX-0190	ERT0013061	FRE 401 - Relevance; FRE 502 – Privilege
TU_EX-0191	ERT0013196	FRE 408 - Settlement Communications
TU_EX-0191	ERT0013197	FRE 408 - Settlement Communications
TU_EX-0192	TU0288803	FRE 401 - Relevance; FRE 408 - Settlement Communications;
TU_EX-0192	TU0288804	FRE 401 - Relevance; FRE 408 - Settlement Communications;
TU_EX-0193	ERT0013288	FRE 408 - Settlement Communications
TU_EX-0193	ERT0013289	FRE 408 - Settlement Communications
TU_EX-0194	ERT0013346	FRE 408 - Settlement Communications
TU_EX-0194	ERT0013347	FRE 408 - Settlement Communications
TU_EX-0195	ITC000112	
TU_EX-0196	ERT0000170	
TU_EX-0197	ERT0000201	
TU_EX-0197	ERT0000202	
TU_EX-0198	ITC000253	

TU Trial Ex. No.	Bates	Objection
TU_EX-0198	ITC000254	
TU_EX-0199	ERT0000217	
TU_EX-0200	ERT0000218	
TU_EX-0200	ERT0000219	
TU_EX-0200	ERT0000220	
TU_EX-0201	ITC000287	
TU_EX-0201	ITC000288	
TU_EX-0201	ITC000289	
TU_EX-0202	ERT0000236	
TU_EX-0203	ERT0000253	
TU_EX-0204	ERT0000756	FRE 802 – Hearsay
TU_EX-0205		
TU_EX-0206		
TU_EX-0207	ERT0000758	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine
TU_EX-0208		
TU_EX-0209		
TU_EX-0210		
TU_EX-0211		
TU_EX-0212		
TU_EX-0213		
TU_EX-0214		
TU_EX-0215		
TU_EX-0216		
TU_EX-0217		FRE 401 - Relevance; FRE 403 – Prejudice
TU_EX-0218		FRE 401 - Relevance; FRE 403 – Prejudice
TU_EX-0219	ERT0000359	
TU_EX-0220		FRE 401 - Relevance; FRE 403 – Prejudice
TU_EX-0221		
TU_EX-0222		
TU_EX-0223		
TU_EX-0224		
TU_EX-0225		
TU_EX-0226		
TU_EX-0227		
TU_EX-0228		
TU_EX-0229		Motion in Limine
TU_EX-0230		FRE 602 - Foundation; FRE 802 - Hearsay; FRE 901 - Authenticity

TU Trial Ex. No.	Bates	Objection
TU_EX-0231		FRE 602 - Foundation; FRE 802 - Hearsay; FRE 901 - Authenticity
TU_EX-0232	TU0001087	FRE 802 - Hearsay
TU_EX-0232	TU0001088	FRE 802 - Hearsay
TU_EX-0233	TU0002302	FRE 802 - Hearsay
TU_EX-0233	TU0002304	FRE 802 - Hearsay
TU_EX-0234	TU0084094	FRE 802 - Hearsay
TU_EX-0234	TU0084095	FRE 802 - Hearsay
TU_EX-0235	TU0088809	FRE 802 - Hearsay
TU_EX-0236	TU0004921	FRE 802 - Hearsay
TU_EX-0237	TU0006005	
TU_EX-0237	TU0006007	
TU_EX-0238	TU0006789	FRE 602 - Foundation; FRE 802 - Hearsay; FRE 901 - Authenticity
TU_EX-0238	TU0006790	FRE 602 - Foundation; FRE 802 - Hearsay; FRE 901 - Authenticity
TU_EX-0239	TU0007242	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0240	TU0119999	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0240	TU0120000	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0241	TU0014025	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0241	TU0014026	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0241	TU0014033	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0242	TU0029317	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0243	TU0036769	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0243	TU0036771	FRE 602 - Foundation; FRE 802 - Hearsay
TU_EX-0244	BONITZ_SUPP_00001	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0245	BONITZ_SUPP_00002	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0246	BONITZ_SUPP_00003	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0247	BONITZ_SUPP_00004	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0248	BONITZ_SUPP_00005	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0249	BONITZ_SUPP_00006	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0250	BONITZ_SUPP_00007	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0251	BONITZ_SUPP_00008	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product

TU Trial Ex. No.	Bates	Objection
TU_EX-0252	BONITZ_SUPP_00009	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0253	BONITZ_SUPP_00010	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0254	BONITZ_SUPP_00011	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0255	BONITZ_SUPP_00012	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0256	BONITZ_SUPP_00013	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0257	BONITZ_SUPP_00014	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0258	BONITZ_SUPP_00015	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0259	BONITZ_SUPP_00016	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0260	BONITZ_SUPP_00017	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0261	BONITZ_SUPP_00018	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0262	BONITZ_SUPP_00019	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0263	BONITZ_SUPP_00020	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0264	BONITZ_SUPP_00021	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0265	BONITZ_SUPP_00022	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0266	BONITZ_SUPP_00023	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0267	BONITZ_SUPP_00024	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0268	BONITZ_SUPP_00025	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0269	BONITZ_SUPP_00026	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0270	BONITZ_SUPP_00027	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0271	BONITZ_SUPP_00028	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0272	BONITZ_SUPP_00029	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0273	BONITZ_SUPP_00030	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product

TU Trial Ex. No.	Bates	Objection
TU_EX-0274	BONITZ_SUPP_00031	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0275	BONITZ_SUPP_00032	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0276	BONITZ_SUPP_00033	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0277	BONITZ_SUPP_00034	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0278	BONITZ_SUPP_00035	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0279	BONITZ_SUPP_00036	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0280	BONITZ_SUPP_00037	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0281	BONITZ_SUPP_00038	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0282	BONITZ_SUPP_00039	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0283	BONITZ_SUPP_00040	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0284	BONITZ_SUPP_00041	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0285	BONITZ_SUPP_00042	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0286	BONITZ_SUPP_00043	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0287	BONITZ_SUPP_00044	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0288	BONITZ_SUPP_00045	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0289	BONITZ_SUPP_00046	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0290	BONITZ_SUPP_00047	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0291	BONITZ_SUPP_00048	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0292	BONITZ_SUPP_00049	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0293	BONITZ_SUPP_00050	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0294	BONITZ_SUPP_00051	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0295	BONITZ_SUPP_00052	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product

TU Trial Ex. No.	Bates	Objection
TU_EX-0296	BONITZ_SUPP_00053	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0297	BONITZ_SUPP_00054	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0298	BONITZ_SUPP_00055	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0299	BONITZ_SUPP_00056	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0300	BONITZ_SUPP_00057	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0301	BONITZ_SUPP_00058	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0302	BONITZ_SUPP_00059	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0303	BONITZ_SUPP_00060	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0304	BONITZ_SUPP_00061	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0305	BONITZ_SUPP_00062	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0306	BONITZ_SUPP_00063	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0307	BONITZ_SUPP_00064	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0308	BONITZ_SUPP_00065	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0309	BONITZ_SUPP_00066	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0310	BONITZ_SUPP_00067	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0311	BONITZ_SUPP_00068	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0312	BONITZ_SUPP_00069	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0313	BONITZ_SUPP_00070	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0314	BONITZ_SUPP_00071	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0315	BONITZ_SUPP_00072	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0316	BONITZ_SUPP_00073	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0317	BONITZ_SUPP_00074	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product

TU Trial Ex. No.	Bates	Objection
TU_EX-0318	BONITZ_SUPP_00075	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0319	BONITZ_SUPP_00076	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0320	BONITZ_SUPP_00077	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0321	BONITZ_SUPP_00078	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0322	BONITZ_SUPP_00079	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0323	BONITZ_SUPP_00080	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0324	BONITZ_SUPP_00081	FRE 403 - Prejudice; FRE 401 - Relevance; Motion in Limine; Work Product
TU_EX-0325		Objections reserved because exhibits not supplied
TU_EX-0326		Objections reserved because exhibits not supplied
TU_EX-0327		Objections reserved because exhibits not supplied
TU_EX-0328		Objections reserved because exhibits not supplied

(f) Proposed Voir Dire Questions

Question for the Court to ask:

1. Now, as we begin the questions, do any of you have trouble reading or understanding the English language?
2. Do any of you have a physical difficulty such as hearing or sight that would make it difficult for you to be a juror in this case?
3. Do any of you know me or my courtroom staff [state names]?
4. Now I will introduce the parties to you. Do you know any of the parties to this lawsuit? Endless River Technologies LLC; Trans Union LLC.
5. Do you know any of the attorneys involved in this lawsuit? Stephen Rosenfeld, David Cupar, Christopher Allen, Jacob Radecki; Mark Premo-Hopkins, and Britt Cramer.
6. The parties may call, but are not required to call, the following witnesses. Please let me know if you know any of them: Richard Bonitz, Phil Wintering, Ronald Somich, Dr. Andrew Malec, Geoffrey Hakel, David Drotos, Emily Lebowitz, Kristin Valters, Tom Shriver, Dr. David Denis.
7. Have you ever heard of a product known as the Quote Exchange? If so, what do you know about it?
8. What is your occupation?
 - a. if working in legal field, what do you do?

b. if working in the insurance field, what do you do?

c. If working in the software development field, what do you do?

9. If empaneled, you will be asked to decide this case solely on the evidence provided in this courtroom, not on sympathy or prejudice or outside knowledge you may have, and on the law, which I, the judge, will instruct you on. If there is any reason you cannot perform this duty in this case, please raise your hand.

(g) Proposed Jury Instructions

Given the number of claims and issues in this case, the parties have agreed to file agreed and disputed jury instructions under separate cover tomorrow, September 8, 2022. We will both file those instructions and provide copies to chambers in Word format via email.

Dated: September 7, 2022

/s/ Stephen J. Rosenfeld

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